



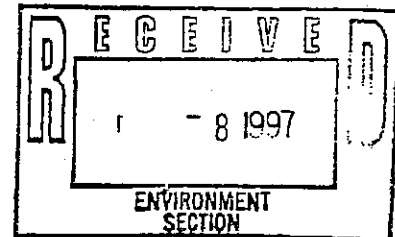
United States Department of the Interior

FISH AND WILDLIFE SERVICE
Marion Illinois Suboffice (ES)
8588 Route 148
Marion, IL 62959
(618) 997-3344

December 4, 1997

Mr. Peter J. Frantz
Chief of Environment
Illinois Dept. of Transportation
2300 South Dirksen Parkway
Springfield, Illinois 62764

RE: FA 999 and Addenda
Job No. P-98-088-91
New Mississippi River Crossing
Missouri Approaches to Illinois Approaches
Madison and St. Clair Counties



Dear Mr. Frantz:

We have received and reviewed the biological surveys for the proposed new Mississippi River Crossing, Madison and St. Clair Counties, Illinois, and St. Louis County, Missouri. This information included fish and mussel historical information, biological surveys, two botanical surveys, two mammal surveys, herpetological survey, final bird survey and bird "hot spot" summary. The documentation also included arials with state and federal listed bird and plant locations. This letter provides comments relative to this biological information and threatened and endangered species and is provided as a follow-up to discussions with Ms. Sue Dees of your staff.

To facilitate compliance with Section 7(c) of the Endangered Species Act of 1973, as amended, Federal agencies are required to obtain from the Fish and Wildlife Service (Service) information concerning any species, listed or proposed to be listed, which may be present in the area of a proposed action. We are providing the following list of species for Madison and St. Clair Counties, Illinois, and St. Louis County, Missouri, to update your records, to assist in evaluating this project and to assist the Federal Highway Administration in meeting the requirements of Section 7.

<u>Classification</u>	<u>Common Name</u>	<u>Scientific Name</u>	<u>Habitat</u>
Endangered	Peregrine falcon	<i>Falco peregrinus</i>	High cliffs
Threatened	Bald eagle	<i>Haliaeetus leucocephalus</i>	Breeds and winters along major rivers and large lakes
Endangered	Least tern	<i>Sterna antillarum</i>	Bare alluvial and dredge spoil islands
Endangered	Pallid sturgeon	<i>Scaphirhynchus albus</i>	Rivers
Endangered	Gray bat	<i>Myotis grisescens</i>	Caves
Endangered	Indiana bat	<i>Myotis sodalis</i>	Caves, mines; small stream corridors with well developed riparian woods; upland forests
Endangered	Fat pocketbook pearly mussel	<i>Potamilus capax</i>	Rivers
Endangered	Pink mucket pearly mussel	<i>Lampsilis orbiculata</i>	Rivers
Endangered	Running buffalo clover	<i>Trifolium stolinferum</i>	Disturbed bottomland meadows
Threatened	Decurrent false aster	<i>Boltonia decurrens</i>	Disturbed alluvial soils
Proposed Endangered	Illinois cave amphipod	<i>Gammarus acherondytes</i>	Cave and karst area streams

There is no designated critical habitat in the project area at this time.

The peregrine falcon typically nests in high cliffs, but in recent years has adapted to the urban environment. The current record for Madison County is a result of a pair nesting within the infrastructure of the I-270 bridge over the Mississippi River in 1996. The bald eagle breeds and winters along major rivers and large reservoirs. A nest was established on Arsenal Island in 1994 but was unsuccessful in producing young. This species heavily utilizes the tailwaters of

lock and dams during winter and is often observed near Melvin Price Locks and Dam.

The least tern utilizes sandbar habitat for nesting and feeds on small fish in shallow water. Least terns have been observed at the Riverlands Area along the Mississippi River, but are presumed to have been migrants. Suitable habitat for this species is not known to be present in the St. Louis harbor.

The fat pocketbook pearly mussel historically occurred in this portion of the Mississippi River. Specimens of this species were transplanted upstream of the project area, but few of these individuals are thought to remain in the area. The pink-mucket pearly mussel is known to occur in the Meramec River, downstream of the project area. We will evaluate the need for a mussel survey following our review of information provided to the Illinois Department of Transportation by Ecological Specialists, Inc.

Suitable habitat for gray bats is not known to occur in the project area. According to the Illinois Natural History Survey report, suitable habitat for Indiana bats will not be affected by Alternate 2. However, some habitat for this species occurs within the corridor for Alternate 3. Should the Alternate 3 corridor be given further consideration in the future, we would recommend tree clearing be prohibited during the Indiana bat maternity season of May 1 to August 31.

The occurrence of running buffalo clover in St. Clair County is historical. No populations are currently known to occur in the area.

The Illinois cave amphipod occurs in the streams of the Illinois sinkhole plain of southwestern Illinois and was historically known to occur in only six cave streams in Monroe and St. Clair Counties. It is currently known to occur in only three caves in Monroe County. The contamination of groundwater is probably the greatest threat to this species. The Illinois sinkhole plain is characterized by numerous sinkholes and fissures which provide direct and rapid conduits from the ground surface to shallow aquifers. Flood pulses, which may come hours or days after a rain or meltwater event, cause levels of contaminants to become transiently higher, up to 10,000 times higher than before the event. The seasonal application of herbicides, pesticides and fertilizers is reflected in spring and well water samples. The accidental or intentional dumping of a toxin into a sinkhole that feeds a cave's groundwater system could cause serious harm to the aquatic biota living in it. Bacterial contamination from sewage disposal finds its way to subsurface water via septic systems, surface discharge, sewage disposal systems or land application of wastes. While the proposed Mississippi River bridge construction is unlikely to have any direct impacts on this species, indirect effects could occur should the residential, commercial and industrial development occurring in the uplands be further influenced by the location and construction of the bridge.

Pallid sturgeon are fish adapted to the swift waters of large, turbid, free-flowing rivers. This species evolved in the diverse environments of the Missouri and Mississippi Rivers. This species is most frequently caught over a sand bottom and is thought to utilize sand or gravel substrates for spawning. Commercial fishermen have reported catching this species in the vicinity of Chester, Illinois. In recent years, the Missouri Department of Conservation released hatchery reared pallid sturgeon into the Missouri and Mississippi Rivers. The Service and the Army Corps of Engineers are currently in the third year of a telemetry study in which pallid sturgeon are being tracked in order to better understand their habitat requirements. The chain-of-rocks area of the Mississippi River, upstream of the project area, is known to be an important shovelnose sturgeon (*Scaphirhynchus platyrhynchus*) spawning area and is thought to also be important to pallid sturgeon. Therefore, it is quite probable that this species occurs in the St. Louis harbor, at least during periods of migration and/or during the spawning season.

Small populations of decurrent false aster have been located at a number of sites within the Alternate 2 corridor. It is evident that the proposed project is likely to adversely affect this species, although the extent of adverse impact will not be known until plans are finalized. There do not appear to be populations of the decurrent false aster along the Alternate 3 corridor at this time.

In order to comply with Section 7 of the Endangered Species Act of 1973, as amended, we recommend the Federal Highway Administration enter into formal consultation to address impacts to threatened and endangered species, particularly the decurrent false aster. To facilitate this process, we recommend a Biological Assessment be prepared. While the Endangered Species Act does not specify what information should be incorporated into a Biological Assessment, we recommend the following steps be taken:

1. Describe the action being considered and the specific area that may be affected by the action. Conduct an on-site inspection of the area affected by the proposed activity, which may include a detailed survey of the area to determine if species are present and whether suitable habitat exists for either expanding the existing population or potential reintroduction of populations.

We recognize that the survey work has already been largely completed and has determined decurrent false aster to be present. We would recommend further surveys to determine the actual extent of impact be conducted as project plans approach completion. A plan to off-set impacts to this species should be developed. Some possible measures to off-set impacts include recolonization utilizing seeds or plants, altering mowing and/or burning schedules within right-of-ways to avoid impacts and the purchase of conservation easements on areas where unaffected populations occur.

Our information indicates the pallid sturgeon is likely to occur in the project area. We do not recommend additional surveys for this species, however, the potential for adverse effects to this species should also be addressed in the Biological Assessment. We also recommend the potential for indirect impacts to the Illinois cave amphipod be addressed.

2. Interview recognized experts on the species including those within the Service, state conservation departments, universities and others who may have data not yet found in scientific literature.
3. Review literature and other scientific data to determine the species' distribution, habitat needs and other biological requirements. Copies of the decurrent false aster and pallid sturgeon recovery plans are included to assist in your analysis.
4. Review, analyze and describe the effects of the proposed action on the species in terms of individuals and populations, including consideration for the cumulative effects of the action on the species and habitat.
5. Analyze alternative actions that may provide conservation measures.

Once the Biological Assessment is finalized, the Federal Highway Administration, acting through the Illinois Department of Transportation, should provide a copy of the Biological Assessment and any other relevant reports to the Service with a written request to initiate formal consultation. Once the consultation package has been provided, the Service will review the information for completeness. If found complete the Service will initiate the formal consultation process which allows for 135 days to complete consultation and prepare a Biological Opinion.

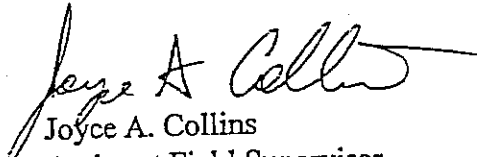
We wish to remind you that Section 7(c) of the Endangered Species Act underscores the requirement that the Federal agency and permit or license applicant shall not make any irreversible or irretrievable commitment of resources during the consultation period which in effect would deny the formulation or implementation of reasonable alternatives regarding their actions on any endangered or threatened species.

Finally, a number of species of concern (former category 2 candidates) occur in the affected counties. These species are fairly well addressed in the biological reports. However, we note that the herpetological survey did not include any discussion regarding the Illinois chorus frog (*Pseudacris streckeri illinoensis*) which is known to occur in Madison County.

Mr. Peter J. Frantz

This information is provided as technical assistance only and does not represent the final opinion of the Fish and Wildlife Service or the Department of the Interior on any forthcoming environmental documents or alternatives. Please contact me at 618/997-3344 should you have any questions.

Sincerely,


Joyce A. Collins
Assistant Field Supervisor

Enclosures

cc: FHWA (Johnson)
IDNR (Hamer, Kruse, Lauzon)
USACOE (McMullen)